

U.S. Department
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**United States
Coast Guard**



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DEPARTMENT OF TRANSPORTATION

U.S. COAST GUARD

STATEMENT OF REAR ADMIRAL ARTHUR E. "GENE" HENN

ON COMMERCIAL FISHING VESSEL SAFETY

BEFORE THE

SUBCOMMITTEES ON COAST GUARD AND NAVIGATION,

FISH AND WILDLIFE, AND OCEANOGRAPHY

COMMITTEE ON MERCHANT MARINE AND FISHERIES

HOUSE OF REPRESENTATIVES

JULY 30, 1991

**Rear Admiral Arthur E. "Gene" Henn
Chief, Office of Marine Safety,
Security and Environmental Protection
United States Coast Guard**

Rear Admiral Arthur Eugene Henn became Chief, Office of Marine Safety, Security and Environmental Protection at Coast Guard Headquarters, Washington, DC, in June 1991. Prior to this assignment, Rear Admiral Henn was Commander of the Maintenance and Logistics Command, Atlantic.

Earlier assignments included that of Operations and Engineering Officer on the Coast Guard cutter CHINCOTEAGUE; Assistant Chief, Merchant Marine Technical Branch, New Orleans, LA; and Special Project Action Officer, Merchant Marine Technical Division, Coast Guard Headquarters.

He was also Marine Inspector and Senior Investigating Officer, Marine Inspection Office, Philadelphia, PA; Chief, Engineering Branch and Chief, Marine Technical and Hazardous Materials Division, Coast Guard Headquarters; Captain of the Port, New York; Commander, Group, New York; Commander, Subsector, New York, Maritime Defense Zone, Atlantic; and Chief, Operations Division and Chief of Staff, Eighth Coast Guard District, New Orleans, LA.

A 1962 graduate of the Coast Guard Academy, Rear Admiral Henn earned combined master of science degrees in naval architecture, marine engineering and metallurgical engineering from the University of Michigan in 1968. Also, he is a 1982 graduate of the Army War College.

His decorations include two Meritorious Service Medals, four Coast Guard Commendation Medals, Coast Guard Unit Commendation Ribbon, Coast Guard Meritorious Unit Commendation Ribbon, Coast Guard Achievement Medal and two Commandant's Letter of Commendation Ribbons.

Rear Admiral Henn is a member of the American Society of Naval Engineers, American Bureau of Shipping, International Cargo Gear Bureau, Marine Index Bureau, Marine Engineering Council of Underwriters Laboratories and the Sealift Committee of the National Defense Transportation Association.

During the past 20 years, he has represented the United States Coast Guard as a member of delegations to the International Maritime Organization, a United Nations specialized agency. He heads United States delegations to meetings of the Maritime Safety and Marine Environment Protection Committees of IMO.

A native of Cincinnati, Ohio, Rear Admiral Henn is married to the former Susan Frances Pedritti, also from Cincinnati. They have two grown children, David and Jennifer.

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THANK YOU MR. CHAIRMAN, I APPRECIATE THE OPPORTUNITY TO MEET WITH YOU TODAY AND TO TELL YOU ABOUT THE COAST GUARD'S EFFORTS IN IMPLEMENTING THE COMMERCIAL FISHING INDUSTRY VESSEL SAFETY ACT OF 1988.

THIS IS MY FIRST APPEARANCE BEFORE THESE SUBCOMMITTEES AS THE NEW CHIEF, OFFICE OF MARINE SAFETY, SECURITY AND ENVIRONMENTAL PROTECTION. I AM NOT, HOWEVER, NEW TO THE COAST GUARD'S EFFORTS IN FISHING VESSEL SAFETY. I HELPED IN THE DEVELOPMENT OF THE COAST GUARD'S VOLUNTARY PROGRAM AND I HAVE FOLLOWED WITH INTEREST OUR EFFORTS IN IMPLEMENTING THE COMMERCIAL FISHING INDUSTRY VESSEL SAFETY ACT OF 1988.

ON THE AVERAGE, ABOUT 100 LIVES AND 250 VESSELS ARE LOST ANNUALLY IN THE COMMERCIAL FISHING INDUSTRY. THE HIGH CASUALTY RATE CAN ONLY PARTIALLY BE ATTRIBUTED TO THE HARSHNESS OF THE ENVIRONMENT IN WHICH THE INDUSTRY OPERATES. THE HUMAN ELEMENT AND THE ECONOMICS OF THE INDUSTRY ARE THE UNDERLYING CAUSES OF MOST CASUALTIES.

WE IN THE COAST GUARD HAVE A LONG HISTORY OF PROMOTING SAFETY AT SEA, INCLUDING SAFETY ON COMMERCIAL FISHING VESSELS. THERE HAVE BEEN SEVERAL EFFORTS TO OBTAIN THE AUTHORITY TO MORE CLOSELY REGULATE THE INDUSTRY, BUT ALL WERE UNSUCCESSFUL--NOT BECAUSE SAFETY DIDN'T NEED TO BE IMPROVED, BUT BECAUSE OF THE LACK OF SUPPORT FROM AND OBJECTIONS BY THE INDUSTRY TO ANY MANDATORY SAFETY REQUIREMENTS. PRIOR TO 1988, THE COAST GUARD HAD LIMITED REGULATORY AUTHORITY FOR COMMERCIAL FISHING VESSELS.

IN THE MID 1970'S, THE COAST GUARD ATTEMPTED TO OBTAIN REGULATORY AUTHORITY TO REQUIRE SAFETY EQUIPMENT, VESSEL INSPECTION, AND LICENSING OF VESSEL PERSONNEL. THIS EFFORT WAS NOT SUCCESSFUL AND WE DEVELOPED ANOTHER APPROACH TO IMPROVING SAFETY. SINCE WE HAD NO AUTHORITY TO IMPROVE SAFETY VIA REGULATORY MEASURES, WE DECIDED TO APPEAL TO THE FISHERMEN'S SENSE OF REASON BY PROVIDING SAFETY-RELATED INFORMATION. THE RESULT OF THIS PHILOSOPHY WAS OUR VOLUNTARY PROGRAM OF THE MID 1980'S. THE COAST GUARD BELIEVED THAT THE VOLUNTARY PROGRAM COULD HAVE A SIGNIFICANT IMPACT ON SAFETY IN THE COMMERCIAL FISHING INDUSTRY. IN THE FIRST PART OF THE VOLUNTARY PROGRAM WE DEVELOPED STANDARDS, IN COOPERATION WITH THE INDUSTRY, THAT COULD BE APPLIED TO VESSELS BY DESIGNERS, BUILDERS, AND OWNERS. THE SECOND PART OF THE PROGRAM SOUGHT TO PROMOTE CREW SAFETY THROUGH DISTRIBUTION OF A SAFETY MANUAL, WHICH WAS ALSO DEVELOPED IN COOPERATION WITH INDUSTRY. WE FELT THAT THE VOLUNTARY PROGRAM WAS A REALISTIC, IMMEDIATE APPROACH TO SAFETY THAT DIDN'T REQUIRE ADDITIONAL AUTHORITY OR RESOURCES.

CLEARLY, REGULATIONS DEVELOPED IN RESPONSE TO THE ACT WILL BE MORE EFFECTIVE THAN THE VOLUNTARY PROGRAM IN REDUCING THE UNACCEPTABLY HIGH CASUALTY RATE IN THE FISHING INDUSTRY.

I WOULD LIKE TO BRIEFLY ADDRESS THE ECONOMIC CONSIDERATIONS OF THE INDUSTRY. THIS IS A TOPIC OF INCREASING INTEREST TO FISHERMEN AND EXPLAINS WHY SAFETY HAS NOT RECEIVED AS MUCH ATTENTION AS WE THINK IT SHOULD. THE FISHERY CONSERVATION AND MANAGEMENT ACT OF 1976 (THE MAGNUSON ACT) CHANGED THE WAY FISHERIES ARE MANAGED BY INCREASING THE IMPORTANCE OF ALLOCATING WHAT WAS ONCE VIEWED AS AN INEXHAUSTIBLE RESOURCE. IN WHAT HAS BEEN REPORTED BY MANY AS AN OVERCAPITALIZED INDUSTRY, THE AVERAGE INDEPENDENT COMMERCIAL FISHERMAN OR MANAGER OF A FISHING COMPANY IS SO CONCERNED WITH FISHERIES QUOTAS AND SPECIES AVAILABILITY THAT SAFETY RECEIVES LITTLE ATTENTION.

I DON'T MEAN TO CHARACTERIZE THE INDUSTRY AS BEING AGAINST SAFETY OR TO INSINUATE THAT FISHERIES MANAGEMENT IS UNIMPORTANT. SAFETY IS LIKE MOTHERHOOD--NOBODY IS AGAINST IT; BUT TO FISHERMEN, SAFETY MEANS INCREASED COSTS. MANY FISHERMEN, ESPECIALLY THE SMALL OPERATORS WHICH COMPRISE THE MAJORITY OF THE INDUSTRY, ARE OPERATING ON THE EDGE FINANCIALLY. MANY OF THEM FEEL THAT ADDITIONAL SAFETY EQUIPMENT IS NOT AFFORDABLE, AND DON'T REALIZE THAT SAFETY AND ECONOMICS GO HAND-IN-HAND. SAFETY IS COST EFFICIENT IN THE LONG RUN--THIS IS ONE OF THE POINTS WE WILL STRESS IN OUR DOCKSIDE BOARDING PROGRAM.

BESIDES THE ECONOMIC CONSIDERATIONS WHICH OVERSHADOW CONCERN FOR SAFETY, PEOPLE MAKE THE DIFFERENCE. WE HAVE LEARNED FROM SOME UNFORTUNATE INCIDENTS THAT THE HUMAN ELEMENT MUST BE ADDRESSED IF SAFETY IS TO IMPROVE SIGNIFICANTLY. THERE MUST BE A COMMITMENT TO SAFETY FROM THE OWNER OR FROM UPPER-LEVEL MANAGEMENT. IN THE PAST, THAT COMMITMENT WAS NOT WIDESPREAD WITHIN THE INDUSTRY, BUT WE HAVE SEEN IT IMPROVED MORE RECENTLY--PRIMARILY DUE TO THE ATTENTION FOCUSED ON IMPLEMENTATION OF THE ACT. MEDIA COVERAGE OF RECENT CASUALTIES HAS ALSO DRAWN ATTENTION TO SAFETY ISSUES AND THE COAST GUARD'S REGULATORY EFFORTS.

MANY IN THE INDUSTRY RECOGNIZE THE INEVITABILITY OF IMPROVING THEIR STANDARD OPERATING PROCEDURES. WE ARE SEEING INCREASING NUMBERS WITHIN THE INDUSTRY MOVING ON THEIR OWN TO IMPROVE SAFETY ABOARD THEIR VESSELS AND DEVELOP STANDARDS THAT CAN BE EASILY FOLLOWED BY AN ENTIRE GROUP OF SIMILAR VESSELS. SOME OWNERS HAVE BANDED TOGETHER AND DEVELOPED THEIR OWN MAINTENANCE AND OPERATING PROCEDURES IN EFFORTS TO IMPROVE THEIR INSURABILITY OR TO INSURE THEMSELVES. WHILE IT IS TRUE THAT THESE ACTIONS ARE DRIVEN BY ECONOMIC CONSIDERATIONS, THE END RESULT IS SAFER VESSELS.

INDIVIDUALS WITHIN THE INDUSTRY ARE REWARDED BECAUSE THEY ARE ADEPT AT HARVESTING, AND THERE HAS BEEN LITTLE EMPHASIS ON DOING THAT JOB SAFELY. THE INDUSTRY PRIDES ITSELF ON ITS INDEPENDENCE AND ABILITY TO CHALLENGE THE ELEMENTS. UNFORTUNATELY, MANY FISHERMEN CONFUSE CHALLENGING THE ELEMENTS WITH TAKING

UNNECESSARY RISKS. THIS FACTION OF THE INDUSTRY IS OF THE OPINION THAT RISK-TAKING IS PART OF THE JOB AND THOSE THAT CAN'T COPE WITH IT SHOULD GET OUT OF THE BUSINESS. THERE ARE MANY COMMUNITIES WHERE GENERATION AFTER GENERATION OF FISHERMEN HAVE SUCCEEDED LONG BEFORE MODERN SAFETY APPLIANCES WERE DEVELOPED AND ARE RELUCTANT TO ADOPT NEW SAFETY EQUIPMENT. THEIR PREDECESSORS DID NOT USE SURVIVAL EQUIPMENT, AND PLANNING FOR EMERGENCY SITUATIONS WAS CONSIDERED FATALISTIC, IF NOT UNMANLY.

AS A CONSEQUENCE OF THESE LONG-HELD TRADITIONS, PUTTING TO SEA MAY NOW INVOLVE ONLY GETTING THE FISHING EQUIPMENT AND THE VESSEL ITSELF READY. THERE IS LITTLE OR NO TIME TAKEN FOR TRAINING IN NAVIGATION AND THE USE OF SAFETY EQUIPMENT. LIKEWISE, LITTLE TIME IS TAKEN FOR PLANNING FOR AN UNEXPECTED EVENT. THESE ATTITUDES ARE SO INGRAINED WITHIN THE FISHING INDUSTRY THAT IT MAY TAKE A GENERATION OF CONSTANT AWARENESS AND TRAINING TO REVERSE THEM.

WE BELIEVE TRAINING IS THE KEY TO REVERSING THESE ATTITUDES. THE ACT DEALS ALMOST EXCLUSIVELY WITH EQUIPMENT, WHICH CAN ONLY PARTIALLY ADDRESS SAFETY PROBLEMS. THOSE IN THE INDUSTRY MUST KNOW INSTINCTIVELY HOW TO USE THAT EQUIPMENT, AND TRAINING IS NECESSARY FOR THIS TO HAPPEN. TRAINING EMPHASIZES THAT SAFETY IS PART OF THE COST OF DOING BUSINESS AND MUST BE CONSIDERED IN EVERY ASPECT OF THE JOB. THE ACT PROVIDES LIMITED AUTHORITY TO REQUIRE TRAINING AND THE COAST GUARD INTENDS TO TAKE FULL ADVANTAGE OF THAT AUTHORITY. GOING TO SEA WILL ALWAYS INVOLVE A

CHALLENGE BUT WE BELIEVE THAT TRAINING IS THE KEY TO MINIMIZING THE RISK. MY PREDECESSORS HAVE STATED THIS PRINCIPLE AND THE COMMERCIAL FISHING INDUSTRY VESSEL ADVISORY COMMITTEE HAS REINFORCED IT.

THE COMMERCIAL FISHING INDUSTRY VESSEL ADVISORY COMMITTEE HAS PROVEN TO BE A VALUABLE RESOURCE IN IMPLEMENTING THE ACT AND IN DEVELOPING THE REGULATIONS. THE ACT CONTAINS PROVISIONS FOR TERMINATING THIS COMMITTEE ON SEPTEMBER 30, 1992. AS PROVIDED IN THE ACT, THE CHAIRMAN HAS RECOMMENDED TO CONGRESS THAT AUTHORIZATION FOR THE COMMITTEE BE RENEWED FOR ANOTHER FIVE YEARS. THE COAST GUARD WOULD LIKE TO GO ON RECORD AS SUPPORTING THAT RECOMMENDATION.

NOW, I WOULD LIKE TO DISCUSS THE COAST GUARD'S EFFORTS SINCE PASSAGE OF THE ACT. OUR FIRST ACTION WAS TO PUBLISH A NOTICE SOLICITING APPLICATIONS FOR THE COMMERCIAL FISHING INDUSTRY VESSEL ADVISORY COMMITTEE. THIS WAS DONE ON SEPTEMBER 23, 1988.

ON DECEMBER 29, 1988, LESS THAN FOUR MONTHS AFTER THE ACT WAS PASSED, THE COAST GUARD PUBLISHED AN ADVANCE NOTICE OF PROPOSED RULEMAKING (ANPRM) FOR COMMERCIAL FISHING INDUSTRY VESSELS. THE COMMENT PERIOD, ORIGINALLY SCHEDULED TO CLOSE FEBRUARY 27, 1989, WAS EXTENDED UNTIL APRIL 15, 1989, BECAUSE OF NUMEROUS REQUESTS FOR ADDITIONAL TIME TO PREPARE RESPONSES. NEARLY 200 COMMENT LETTERS WERE RECEIVED IN RESPONSE TO THE ANPRM.

FINAL ADVISORY COMMITTEE SELECTIONS WERE COMPLETED ON MARCH 15, 1989. THE FIRST MEETING OF THE COMMITTEE WAS HELD A MONTH LATER. AT THAT MEETING, THE ANPRM WAS DISCUSSED AND THREE SUBCOMMITTEES WERE FORMED TO REVIEW DIFFERENT AREAS OF THE PENDING REGULATIONS AND THE LICENSING PLAN REQUIRED BY THE ACT. THE COMMITTEE RECOMMENDED THAT AT LEAST TEN PUBLIC HEARINGS ON THE NOTICE OF PROPOSED RULEMAKING (NPRM) BE HELD AND THAT ADDITIONAL ADVISORY COMMITTEE MEETINGS BE HELD PRIOR TO PUBLICATION OF THE NPRM.

THE SECOND MEETING OF THE ADVISORY COMMITTEE WAS HELD ON JULY 6, 1989, TO FURTHER DISCUSS DEVELOPMENT OF THE NPRM AND TO PROVIDE THE COAST GUARD WITH RECOMMENDATIONS ON THE CONTENT AND FORM OF THE NPRM.

ON OCTOBER 12, 1989, COAST GUARD REPRESENTATIVES MET WITH MEMBERS OF THE AMERICAN INSTITUTE OF MARINE UNDERWRITERS IN A PUBLIC MEETING. THE PURPOSE OF THIS MEETING WAS TO DISCUSS, WITH THE INSURANCE INDUSTRY, IMPLEMENTATION OF THE ACT RELATIVE TO COLLECTION OF CASUALTY DATA. AT THIS MEETING, USE OF THE MARINE INDEX BUREAU (MIB) AS A QUALIFIED THIRD PARTY COLLECTION AGENCY WAS ENDORSED. THE COAST GUARD FORMALLY ACCEPTED THE MIB FOR COLLECTION OF CASUALTY DATA ON MAY 4, 1990.

THE THIRD MEETING OF THE ADVISORY COMMITTEE WAS HELD ON OCTOBER 22, 1989, IN SEATTLE, WASHINGTON, FOLLOWING A LARGE INDUSTRY TRADE SHOW. THIS MEETING WAS WELL-ATTENDED BY THE PUBLIC.

ON DECEMBER 19, 1989, THE COAST GUARD PUBLISHED A FEDERAL REGISTER NOTICE REQUESTING COMMENTS ON ALTERNATIVES TO CONSIDER IN DEVELOPING THE PLAN FOR LICENSING OPERATORS OF DOCUMENTED COMMERCIAL FISHING INDUSTRY VESSELS. THIS PLAN IS REQUIRED BY THE ACT.

THE FOURTH MEETING OF THE ADVISORY COMMITTEE WAS HELD IN JANUARY OF 1990. LENGTHY DISCUSSIONS RESULTED IN THE COMMITTEE'S RECOMMENDATIONS ON LEVELS OF COMPETENCY AND PERSONAL QUALIFICATIONS FOR DIFFERENT POSITIONS WITHIN THE INDUSTRY. THESE RECOMMENDATIONS WERE USED BY THE COAST GUARD IN DEVELOPING THE PLAN FOR LICENSING OPERATORS OF DOCUMENTED FISHING INDUSTRY VESSELS.

ON APRIL 19, 1990, THE NPRM FOR COMMERCIAL FISHING INDUSTRY REGULATIONS WAS PUBLISHED. DURING THE COMMENT PERIOD FOR THE NPRM, 13 PUBLIC HEARINGS WERE HELD TO ALLOW MEMBERS OF THE COMMERCIAL FISHING INDUSTRY TO PRESENT ORAL COMMENTS ON THE PROPOSED RULES. ADDITIONALLY, AT NINE OF THESE LOCATIONS, PUBLIC MEETINGS TO DISCUSS ALTERNATIVES FOR THE LICENSING PLAN WERE ALSO HELD.

A 120-DAY COMMENT PERIOD WAS PROVIDED IN THE NPRM TO ALLOW THE INDUSTRY TO REVIEW AND COMMENT ON THE PROPOSED RULES. SHORTLY AFTER PUBLICATION OF THE NPRM, THE COAST GUARD MAILED OVER 1,500 COPIES TO MEMBERS OF THE MEDIA AND TO INDUSTRY ORGANIZATIONS TO

HELP PUBLICIZE THE PROPOSED RULES AND ELICIT COMMENTS. WE WERE CRITICIZED FOR PUBLISHING THE NPRM IN THE SPRING AND FOR HOLDING PUBLIC HEARINGS IN THE SUMMER WHEN FISHERMEN ARE AT THEIR BUSIEST, BUT TO KEEP THE PROCESS MOVING FORWARD, THE COMMENT PERIOD ENDED ON AUGUST 20, 1990, DESPITE SEVERAL REQUESTS TO EXTEND IT. NONETHELESS, OVER 500 COMMENT LETTERS WERE RECEIVED IN RESPONSE TO THE NPRM, INCLUDING THOSE COMMENTS RECEIVED AT THE 13 PUBLIC HEARINGS.

ON AUGUST 31, 1990, THE COAST GUARD ANNOUNCED ITS INTENTION TO SPLIT SEVERAL ITEMS FROM THE NPRM INTO A SEPARATE RULEMAKING, TO BE PUBLISHED AS A SUPPLEMENTAL NOTICE OF PROPOSED RULEMAKING (SNPRM). THE ITEMS TO BE INCLUDED IN THE SNPRM ARE: STABILITY FOR VESSELS LESS THAN 79 FEET IN LENGTH; SURVIVAL CRAFT ON VESSELS OPERATING INSIDE OR NEAR THE BOUNDARY LINE WITH LESS THAN FOUR INDIVIDUALS ON BOARD; AND ADMINISTRATION OF THE EXEMPTION PROVISIONS OF THE ACT. THESE TOPICS RAISED THE MOST QUESTIONS AT THE PUBLIC HEARINGS ON THE NPRM AND WERE SEPARATED FROM THE ORIGINAL RULEMAKING SO THAT THE MAJORITY OF THE REGULATIONS WOULD NOT BE DELAYED WHILE THE COAST GUARD DEVELOPED PROPOSED RULES ON THESE MORE CONTROVERSIAL TOPICS.

STABILITY REQUIREMENTS FOR VESSELS OBTAINING A LOAD LINE CERTIFICATE WILL ALSO BE INCLUDED IN THE SNPRM. ON NOVEMBER 16, 1990, THE ALEUTIAN TRADE ACT (ATA) WAS PASSED. THE ATA AMENDS CERTAIN PROVISIONS OF THE COMMERCIAL FISHING INDUSTRY VESSEL SAFETY ACT OF 1988 AND REQUIRES IMPLEMENTING REGULATIONS.

THESE REGULATIONS WILL ALSO BE ADDRESSED IN THE SNPRM, WHICH SHOULD BE PUBLISHED BY THIS FALL. THE FINAL RULES ARE EXPECTED TO BE PUBLISHED SOON, WE ARE WORKING WITH THE OFFICE OF MANAGEMENT AND BUDGET TO RESOLVE THE REMAINING QUESTIONS.

THE QUESTION HAS BEEN ASKED IF THE COAST GUARD COULD HAVE COMPLETED THE NPRM AND FINAL RULE IN LESS TIME. THE ANSWER IS, "NO." THE COAST GUARD ASSIGNED THIS REGULATORY EFFORT TOP PRIORITY. WE UTILIZED PERSONNEL EXPERIENCED WITH THE RULEMAKING PROCESS TO DEVELOP BOTH THE NPRM AND THE FINAL RULE--PERSONNEL WHO HAD BEEN ASSIGNED TO OTHER RESPONSIBILITIES PRIOR TO THE ACT.

BESIDES THE REGULATORY EFFORT JUST DESCRIBED, THERE HAS BEEN SIGNIFICANT EFFORT EXPENDED IN DEVELOPING A PLAN FOR LICENSING OPERATORS OF DOCUMENTED FISHING INDUSTRY VESSELS AND IN DEVELOPING GUIDANCE TO THE FIELD AND INDUSTRY CONCERNING IMPLEMENTATION OF THE REGULATIONS.

I WOULD NOW LIKE TO ADDRESS THE NATIONAL RESEARCH COUNCIL MARINE BOARD'S STUDY OF FISHING VESSEL SAFETY. THIS STUDY WAS REQUIRED BY THE ACT AS A FORERUNNER OF RECOMMENDATIONS ON AN INSPECTION PROGRAM. DISCUSSIONS WITH THE MARINE BOARD CONCERNING A FORMAL AGREEMENT BEGAN ON OCTOBER 7, 1988. THE COMMITTEE FORMED BY THE MARINE BOARD FIRST MET ON JUNE 15, 1989, AND THE STUDY WAS RELEASED ON MAY 23, 1991, THIS WAS CONSISTENT WITH THEIR ORIGINAL ESTIMATE THAT THE STUDY WOULD TAKE APPROXIMATELY 24 MONTHS TO COMPLETE.

THE STUDY INCLUDES ANALYSIS OF CASUALTY DATA AND REGIONAL QUESTIONNAIRES. THE MARINE BOARD'S WORK RESULTED IN 30 ALTERNATIVES FOR IMPROVING SAFETY IN THE COMMERCIAL FISHING INDUSTRY, DIVIDED INTO FIVE MAJOR AREAS: SAFETY ADMINISTRATION; VESSEL FITNESS; HUMAN FACTORS; SAFETY EQUIPMENT AND SURVIVAL; AND EXTERNAL INFLUENCES. THE ALTERNATIVES INCLUDED BOTH SHORT- AND LONG-TERM METHODS OF IMPROVING SAFETY. THE 30 ALTERNATIVES WERE CONDENSED INTO 18 RECOMMENDATIONS, 15 OF WHICH WERE DIRECTED TO THE COAST GUARD.

THE MARINE BOARD'S STUDY WAS FORWARDED TO MEMBERS OF THE ADVISORY COMMITTEE ON THE SAME DAY IT WAS RELEASED AND SUBSEQUENTLY DISCUSSED WITH THE ADVISORY COMMITTEE AT THEIR FIFTH MEETING ON JUNE 17, 1991. THE ADVISORY COMMITTEE WAS IN GENERAL AGREEMENT WITH THE RECOMMENDATIONS MADE IN THE STUDY, AS REFLECTED IN THE MINUTES OF THE MEETING. THE COAST GUARD HAS REVIEWED THE MARINE BOARD'S RECOMMENDATIONS IN DETAIL AND IS IN GENERAL AGREEMENT WITH THE DIRECTION OF THOSE RECOMMENDATIONS. WE WILL ADDRESS THEM WHEN SUBMITTING OUR OWN RECOMMENDATIONS ON AN INSPECTION PROBLEM (AS REQUIRED BY THE ACT), AND IN OUR RECOMMENDATIONS ADDRESSING UNCLASSIFIED FISH-PROCESSING VESSELS. WE EXPECT TO SUBMIT THOSE RECOMMENDATIONS IN THE FALL OF THIS YEAR.

BECAUSE OF THE NUMEROUS DATES INVOLVED IN DEVELOPMENT AND PUBLICATION OF THE REGULATIONS, TOGETHER WITH THE CONTINUAL INTERACTION WITH THE COMMERCIAL FISHING INDUSTRY VESSEL ADVISORY

COMMITTEE, I HAVE APPENDED TO THE END OF MY STATEMENT A TIME LINE WHICH YOU MAY FIND USEFUL AS A SNAPSHOT OF THE COAST GUARD'S ACTIVITIES SINCE PASSAGE OF THE ACT.

IN CONCLUSION, MR. CHAIRMAN, I BELIEVE THAT THE COAST GUARD HAS DONE A GOOD JOB IN IMPLEMENTING THE COMMERCIAL FISHING INDUSTRY VESSEL SAFETY ACT OF 1988. I BELIEVE THAT WITH THE SOON-TO-BE PUBLISHED REGULATIONS, WE WILL SEE MARKED SAFETY IMPROVEMENTS IN THE COMMERCIAL FISHING INDUSTRY.

THANK YOU, MR. CHAIRMAN. I WOULD BE PLEASED TO ANSWER QUESTIONS AT THIS TIME.